

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
FOR THE EASTERN DIVISION**

**JANE ROE, individually and on  
behalf of all others similarly  
situated,**

**Plaintiff,**

**V.**

**INTELLICORP RECORDS, INC.**

**Defendant.**

**CASE NO. 1:12CV02288**

**JUDGE JAMES S. GWIN**

**MAGISTRATE JUDGE GREG  
WHITE**

**JOINT MOTION TO CONTINUE  
ALL DATES**

**MICHAEL R. THOMAS, individually  
and on behalf of all others similarly  
situated,**

**Plaintiff,**

**V.**

**INTELLICORP RECORDS, INC.**

**Defendant.**

**CASE NO. 1:12CV02443**

**JUDGE JAMES S. GWIN**

**MAGISTRATE JUDGE GREG  
WHITE**

**JOINT MOTION TO CONTINUE  
ALL DATES**

**MARK A. JOHNSON, individually  
and on behalf of all others similarly  
situated,**

**Plaintiff,**

**V.**

**INSURANCE INFORMATION  
EXCHANGE, LLC,**

**Defendant.**

**CASE NO. 1:13CV00616**

**JUDGE JAMES S. GWIN**

**MAGISTRATE JUDGE GREG  
WHITE**

**JOINT MOTION TO CONTINUE  
ALL DATES**

Plaintiffs Jane Roe, Michael R. Thomas, and Mark A. Johnson and Defendants Intellicorp Records, Inc., and Insurance Information Exchange, LLC, jointly move this Court to continue all dates in the above-captioned matters by 30 days. Following the hearing before the Court on June 27, 2013, the parties have made substantial progress towards settlement with the assistance of mediator Niki Z. Schwartz. The parties are currently engaged in negotiating and finalizing a memorandum of understanding regarding settlement. Mr. Schwartz and the parties believe that a brief 30-day extension of time will facilitate their discussions. Good cause therefore exists to grant this motion.

For purposes of clarity, the parties are requesting that the Court adopt the following amended case management schedule:

| Event   | Current Deadline   | New Deadline       |
|---|--------------------|--------------------|
| Deadline for Class Certification Discovery<br><br>(Case Nos. 1:12cv02443 and 1:13cv00616 only)            | August 5, 2013     | September 4, 2013  |
| Deadline for Class Certification Motion<br><br>(Case Nos. 1:12cv02443 and 1:13cv00616 only)               | August 19, 2013    | September 18, 2013 |
| Deadline for Opposition to Class Certification Motion<br><br>(Case Nos. 1:12cv02443 and 1:13cv00616 only) | September 9, 2013  | October 9, 2013    |
| Deadline for Reply to Class Certification Motion<br><br>(Case Nos. 1:12cv02443 and 1:13cv00616 only)      | September 23, 2013 | October 23, 2013   |
| Deadline for Completing Discovery Needed to Support or Defend   | October 7, 2013    | November 6, 2013   |

|   |                   |   |
|---|-------------------|---|
| Dispositive Motions                                   |                   |   |
| Deadline for Filing Dispositive Motions               | October 15, 2013  | November 14, 2013                                     |
| Deadline for Filing Opposition to Dispositive Motions | November 4, 2013  | December 4, 2013                                      |
| Deadline for Filing Replies to Responses              | November 11, 2013 | December 11, 2013                                     |
| Pre-trial Conference                                  | December 19, 2013 | January 20, 2014<br>(subject to the Court's schedule) |
| Trial   | January 6, 2014   | February 5, 2014<br>(subject to the Court's schedule) |

For the foregoing reasons, the parties request that the Court continue all dates in the above-captioned matters by 30 days.

Dated: July 19, 2013

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on July 19, 2013, a true and correct copy of the foregoing document was filed electronically. Notification of this filing will be sent to the parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Respectfully submitted,

Matthew A. Dooley  
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